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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
GIOVANNI ELEAZAR PACO,  
  
Defendant.

CASE NO. 2:23-CR-214-WBS

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: December 16, 2024  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

**STIPULATION**

1. This matter was set for status conference before the Honorable William B. Shubb on November 4, 2024. Time has been excluded through and including December 16, 2024.

2. By this stipulation, the parties request to continue the status conference to **February 24, 2025, at 10:00 a.m.**, and to exclude time between December 16, 2024, and February 24, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes investigative reports and related documents in electronic form including over 4,698 pages of documents, numerous photographs, lab reports, criminal history reports, multiple video and audio recordings, and other material. All of this discovery has been either produced directly to counsel and/or made available for inspection.

b) Counsel for defendant desires additional time to consult with his client, review the charges, conduct investigation and research related to the charges, review the discovery, discuss potential resolutions with his client, prepare pretrial motions, and otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of December 16, 2024 to February 24, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Respectfully Submitted,

Dated: December 11, 2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ DAVID W. SPENCER  
DAVID W. SPENCER  
Assistant United States Attorney


Dated: December 11, 2024

/s/ MICHAEL E. HANSEN  
MICHAEL E. HANSEN  
Counsel for Defendant  
Jiovanni Eleazar Paco

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: December 11, 2024



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE